

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ECF Case

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ADRIAN HUFF, as Chairman of the Board of Trustees of
TEAMSTERS LOCAL 445 FREIGHT DIVISION
PENSION FUND,

Plaintiff,

Civil Action No. 07 Civ. 5926
(CLB)(MDF)

- against -

MID-HUDSON STEEL CORP., GRAMMAR, DEMPSEY
& HUDSON, INC., BRIDGEPORT STEEL CO., BUELL
SPECIALTY STEEL CO., PABRICO STEEL
FABRICATORS INC., ZINC CONSTRUCTION CORP.,
and AIROTRAX, INC.,

Defendants.

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**NOTICE OF PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT**

PLEASE TAKE NOTICE, that upon the attached Affidavit of William D. Frumkin, Esq., with exhibits thereto, Plaintiff's Memorandum of Law, and the pleadings and proceedings in this action, Plaintiff will move before the Hon. Charles L. Brieant, United States District Judge, in the United States Courthouse, Courtroom 275, located at 300 Quarropas St., White Plains, New York 10601, on August 1, 2008 or a date to be set by the Court, for summary judgment granting Plaintiff the entire amount of the assessed withdrawal liability as set forth in Plaintiff's Second Amended Complaint plus interest, liquidated damages, attorney's fees, costs and granting such other relief as the Court deems just, proper, and equitable.

Dated: White Plains, New York
June 30, 2008

Respectfully submitted,

SAPIR & FRUMKIN LLP

By: /s/William D. Frumkin
William D. Frumkin (WF 2173)
Attorneys for Plaintiff
399 Knollwood Road, Suite 310
White Plains, New York 10603
(914) 328-0366

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2008, a copy of Notice of Plaintiff's Motion for Summary Judgment was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt including:

Keith R. McMurdy, Esq.
Fox Rothschild, LLP
100 Park Avenue, Suite 1500
New York, New York 10017

Parties may access this filing through the Court's electronic filing system

/s/ Rachel L. Horton
Rachel L. Horton